

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA)	CASE NO. 2:17-CR-146
)	
Plaintiff,)	HONORABLE
)	ALGENON L. MARBLEY
)	
-V-)	<u>REQUEST TO AMEND A</u>
)	<u>CONDITION OF BOND</u>
GIFTY KUSI)	
)	
Defendant.)	

Now comes defendant, by and through undersigned counsel, and hereby moves this Honorable Court to temporarily amend the ankle monitor requirement as a condition of bond. Undersigned counsel was advised by his client and has confirmed with U.S. Pretrial Services Officer Tiara Tuner that Ms. Kusi needs to address the ankle monitor as she is in the latter stages of her pregnancy. Counsel requests this Honorable Court to allow Miss Turner to temporarily remove the ankle monitor until the birth of the baby and up until the point where Ms. Kusi is released from the hospital.

Respectfully submitted,

/J. Anthony Rich/

J. Anthony Rich (0066295)
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CERTIFICATE OF SERVICE

A copy of the foregoing was delivered via e-mail this 3rd day of June 2019 to the United States Attorney's Office.

/J. Anthony Rich/

J. Anthony Rich (0066295)
Counsel for Defendant